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Attorneys for Plaintiff Parnell Jay Fair

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PARNELL JAY FAIR, individually,

 Plaintiff,

 v.

LAS VEGAS METROPOLITAN POLICE
 DEPARTMENT, a political subdivision of the
 State of Nevada; L. TURLEY P# 15885,
 individually; A. RYNDAL P# 16540,
 individually; UNIVERSITY MEDICAL
 CENTER, D/B/A UNIVERSITY MEDICAL
 CENTER OF SOUTHERN NEVADA, a Nevada
 Governmental Entity; CHASITY TRAVIS,
 individually; JENNA A. DOUD, individually;
 JESSE WELLS, individually; CASEY ALLEN
 ROEHR, individually; HOWARD SHANE,
 individually; SCOTT KEVIN LEE, individually;
 BROCK T. WENTZ, individually; DOES I – X,
 and ROES I – X, inclusive

Defendants.

CASE NO: 2:20-cv-01841-JCM-BNW

STIPULATION AND ORDER
TO EXTEND PLAINTIFF’S DEADLINE TO
FILE HIS RESPONSE TO DEFENDANT
BROCK T. WENTZ, D.O.’S MOTION TO
DISMISS (ECF NO. 16)

(*First Request*)

WHEREAS Defendant Brock T. Wentz, D.O. filed his Motion to Dismiss (“Motion”) on
 November 2, 2020 (ECF No. 16) in response to Plaintiff’s Complaint (ECF No. 1).

Pursuant to Local Rule IA 6-1(a), the Parties hereby stipulate and agree to extend the
 deadline for Plaintiff to file his response to Defendant Brock T. Wentz, D.O.’s Motion. The current
 deadline for Plaintiff to respond to Defendant Brock T. Wentz, D.O.’s Motion is **November 16,**

2020. The new deadline for Plaintiff to respond to Defendant Brock T. Wentz, D.O.'s Motion will be **January 31, 2021**.

Good cause exists for the extension because Plaintiff is expecting to receive similar motions to dismiss from other medical provider Defendants who have not yet appeared in this case. Further, given that Plaintiff expects to receive numerous upcoming motions, the Parties believe that, in the interest of judicial economy, it would be prudent for Plaintiff to respond to Defendant Brock T. Wentz, D.O.'s Motion at the same time as he prepares responses to the other expected motions, once all of the other medical provider Defendants have made their appearances in this action and filed their responsive pleadings. Finally, good cause also exists to extend Plaintiff's response deadline to January 31, 2021 because the upcoming holidays will limit the availability for Plaintiff's counsel to draft a comprehensive and meaningful response.

This extension is the first request for an extension and is not submitted for the purpose of delay.

IT IS SO STIPULATED AND AGREED.

DATED this 6th day of November, 2020.

DATED this 6th day of November, 2020.

LAGOMARSINO LAW

**LEWIS BRISBOIS BISGAARD & SMITH
LLP**

/s/ Daven P. Cameron
Andre M. Lagomarsino, Esq. (#6711)
Daven P. Cameron, Esq. (#14179)
3005 West Horizon Ridge Parkway, #241
Henderson, Nevada 89052
Attorneys for Plaintiff Parnell Jay Fair

/s/ MELANIE L. THOMAS
Keith A. Weaver, Esq.
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Melanie L. Thomas, Esq.
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Attorneys for Defendant Brock T. Wentz, D.O.

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1 DATED this 6th day of November, 2020.

2 KAEMPFER CROWELL

3 /s/ Lyssa Anderson

4 Lyssa S. Anderson, Esq.
5 Ryan W. Daniels, Esq.
6 1980 Festival Plaza Drive, Suite 650
7 Las Vegas, Nevada 89135
8 *Attorneys for Defendants LVMPD, Lukas*
9 *Turley, and Alexander Ryndak*

10 DATED this 6th day of November, 2020.

11 McBRIDE HALL

12 /s/ Robert McBride

13 Robert C. McBride, Esq.
14 8329 West Sunset Road, Suite 260
15 Las Vegas, Nevada 89113
16 *Attorney for Defendant Jenna Doud and Jesse*
17 *Wells*

18 **IT IS SO ORDERED.**

DATED this 6th day of November, 2020.

PITEGOFF LAW OFFICE

/s/ Jeffrey I. Pitegoff

Jeffrey I. Pitegoff, Esq.
911 Buffalo Drive, Suite 201
Las Vegas, Nevada 89128
Attorney for Defendants University Medical
Center and Chasity Travis


UNITED STATES DISTRICT COURT JUDGE

DATED: November 9, 2020